UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOSEPH S. BEALE,) Case No. 07 CV 6909
Plaintiff,) Judge Kocoras
v. REVOLUTION PORTFOLIO, LLC, and SECURITY LIFE OF DENVER) Magistrate Judge Valdez)
INSURANCE COMPANY d/b/a/ ING,)
Defendants.)
REVOLUTION PORTFOLIO, LLC,)
Counter-Plaintiff,)
v.)
JOSEPH S. BEALE,))
Counter-Defendant.	,)

NOTICE OF MOTION

To:	Matthew P. Connelly	Christopher B. Lega	Thomas B. Keegan
	Garrett C. Carter	Reimer & Braunstein, LLP	Edward Gleason
	Connelly, Roberts	Three Center Plaza	Keegan, Laterza,
	& McGivney, LLC	6th Floor	Lofgren & Gleason. LLC
	55 W. Monroe St.	Boston, MA 02108	566 W. Adams St.
	Suite 1700		Suite 750
	Chicago, IL 60603		Chicago, IL 60661

PLEASE TAKE NOTICE that on May 6, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Charles P. Kocoras, or any judge sitting in his stead, in the United States District Court for the Northern District of Illinois, Room 1725, Chicago,

Illinois, and then and there present Plaintiff's Motion to Compel, a copy of which is served upon you herewith.

Respectfully submitted,

JOSEPH S. BEALE

By: /s/ Monte L. Mann
One of His Attorneys

Monte L. Mann Richard G. Douglass NOVACK AND MACEY LLP 100 N. Riverside Plaza Chicago, Illinois 60606 (312) 419-6900 Firm No. 91731

CERTIFICATE OF SERVICE

Monte L. Mann, an attorney, hereby certifies that, on April 21, 2008, he caused a true and correct copy of the foregoing *Notice of Motion* to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to receive electronic filings as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

